

JUL 26 2023

Nathan Ochsner, Clerk of Court

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In re; Chapter 11

TEHUME CARE SERVICES INC. CASE NO# 23-90086(CML)

AUTHORITY

This filing is made under FRCP 1334 (A) which state's "Except as otherwise provided in subsection (b) of this section, the district court shall have original and exclusive jurisdiction of all cases under title 11."

FACTUAL BASIS OF CLAIM

Claimant is a ward of the state of Michigan and is currently a prisoner in the Michigan Department Of Corrections, for which your company did/does provide health care insurance to at the time the injury took place.

The claimant suffered permanent damage to his spinal cord as a result of denial of testing and treatment.

The claimant began requesting treatment by health care in October of 2020 for pain and tingling in his hip, leg, arm and hands.

This then radiated to the entire body in the form of numbness, tingling, acute pain and weakness and at one point the claimant was barely able to walk on his own.

The claimant filed no less than twenty six (26) requests over the next year trying to get treated for whatever was wrong with him. After complaining for a year, the claimant wrote and filed a grievance alleging that health care was being deliberately indifferent to his health care needs and that this thereby constituted cruel and unusual punishment and carried it to the third step.

He received a response dated January 11, 2021 with a mailing date of January 26, 2021.

During the time between the first and third step, the health care provider finally sent the claimant for testing, first to a neurologist who instantly recognized the symptoms her was suffering and recommended an M.R.I. be performed as soon as possible to catch the issue BEFORE it caused permanent damage.

An M.R.I. was performed and the results showed that the claimant suffers from degenerative Disc disease in his cervical spinal column and he had discs that were impinging on the spinal cord to the point of him being in a critical condition.

Upon reviewing the images of the M.R.I., the radiologist called the prison health care provider, a minute after it was read, to inform them that claimant was in critical condition.

This fact is noted in the "Final Radiology Report Dated 11/1/21

The claimants discs at the C5-C6 and C6-C7 had protruded in the spinal cord causing severe spinal cord compression.

The spinal fluid that is normally surrounding the spinal cord was pushed out of the way allowing the membrane to come into contact with the spinal cord and causing permanent damage in this area.

Claimant was sent for a consultation with a neurosurgeon who showed him the M.R.I. images and pointed out the white spot of permanent damage to his spinal cord explaining that it would never heal.

The neurosurgeon immediately admitted the claimant into the hospital to keep him under observation until surgery could be performed.

Claimant was required to remain in bed unless assisted to avoid falls or wrong turns that would leave him fully paralyzed from the neck down for the rest of his life.

The surgery was performed on 11/11/21.

This was a major highly invasive operation on the claimants neck and spinal cord that could of left him paralyzed or an infection causing other harm.

He was placed under anesthesia and his opened to his spinal cord. He could of suffered a reaction to the anesthesia or other drugs used and possibly have died.

Due to the nature of the injury the claimant suffered, it took over a year for him to have some type of recovery and for the permanent damage to become apparent how it affected his body.

The Claimant suffered a carpal tunnel injury to his right hand due to the hand and arm being numb and not feeling pain before it cause him damage.

He is primarily right handed and is a musician by trade.

In addition, he still has bad discs in his neck that are causing him issue that are not being addressed and there has been no treatment plan communicated to him for this.

Claimants spinal cord was swollen and this was a very dangerous situation that could of been avoided with the proper tests early on.

Claimants hand and arm are still painful and little has been done to treat this properly.

His walk and gait are unsteady at best and he has a "Flop Footed Step": on his right side.

The left side of his body feels constantly warm even when the skin is cold to the touch.

He still has pain in his neck from the other bad discs.

RELIEF REQUESTED

There for, i request the following relief;

A one time sum of 1,500,000.00 to include all costs and fees.

associated with this action that I have incurred.

I also request the court grant an extension to the claims bar date, and if there are any video meetings or other hearings that I be allowed to take part which may require an order or request from the court to the Kinross Correctional Facility

I have read the foregoing and believe it to be true to the best of my knowledge, information and belief.

/s/ Scott Woodbury
Scott Woodbury

Dated: 7/12/23

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In re;

Chapter 11

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CASE NO# 23-90086(CML)

APPEARANCE

Now comes, Scott William Woodbury, and files this APPEARANCE on behalf of himself acting in Pro-per

He requests that any and all documents filed in this action be sent to him at the following address;

Scott W. Woodbury #203038
Kinross Correctional Facility
4533 W. Industrial Park Drive
Kincheloe, Michigan
49788

/s/ Scott Woodbury
Scott Woodbury #203038

Date: 7/12/23

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PROOF OF SERVICE

Now comes, Scott William Woodbury, and states that he served the following documents;

Claimants Response and
And Factual Basis Of Claim
Appearance

TEHUME CARE SERVICES INC.

on;

at the following address;

c/o KCC
222 N. Pacific Coast Highway, Suite 300
El Segundo, CA.
90245

By first class mail.

I have read the foregoing and believe it to be true to the best of my knowledge, infomation and belief.

/s/ Scott Woodbury
Scott Woodbury

DATE: 7/12/23

SCOTT WOODBURY 203038
KINROSS CORRECTIONAL FACILITY
4533 W. INDUSTRIAL PARK DRIVE
KINCHELOE MICHIGAN
49788

COURT CLERK
UNITED STATES COURTHOUSE
BAJ RUPTCY DIVISION
515 RUSK AVENUE
HOUSTON, TEXAS
77002